

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MFB FERTILITY INC., )  
                          )  
Plaintiff,           ) Case No. 1:23-cv-17000  
                          )  
v.                     ) Judge Robert W. Gettleman  
                          )  
WONDFO USA CO., LTD., )  
                          )  
Defendant.           )

**DEFENDANT WONDFO USA CO., LTD.'S MOTION TO DISMISS**

Defendant Wondfo USA Co., Ltd. (“Wondfo”), by and through its undersigned counsel, respectfully moves this Court for an Order dismissing Plaintiff MFB Fertility Inc.’s (“MFB”) Complaint in its entirety and with prejudice under Federal Rule of Civil Procedure 12(b)(6) for the reasons set forth in Wondfo’s accompanying Memorandum of Law.

Wherefore, Defendant Wondfo USA Co., Ltd. respectfully requests that this Court dismiss each of MFB’s claims with prejudice under Federal Rule of Civil Procedure 12(b)(6). Wondfo also respectfully requests that the Court award any and all further relief that it deems just and necessary.

Dated: May 8, 2024

Respectfully submitted,

/s/ Abram I. Moore

Abram I. Moore

AMoore@Venable.com

Nelson M. Hua

NMHua@Venable.com

**VENABLE LLP**

227 West Monroe Street, Suite 1900

Chicago, IL 60606

Telephone: (312) 820-3400

Facsimile: (312) 820-3401

*Counsel for Defendant Wondfo USA Co., Ltd.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 8, 2024, the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF System, which will send an electronic copy of the foregoing to counsel of record and constitutes service pursuant to Local Rule 5.9 of the Northern District of Illinois.

/s/ Abram I. Moore  
Abram I. Moore